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Subject: ESD Comment Final Letter to EPA

To Whom it May Concern:

I am writing to share my concerns regarding the EPA Region 10's proposed changes to the Lower Duwamish Waterway Superfund Site Record of Decision in December 2014 and to request that this decision be delayed until the EPA conduct additional community outreach and there is further research conducted on the matter of Benzo(a)pyrene and six other carcinogenic polycyclic aromatic hydrocarbons (cPAHs).

I understand that the 2017 EPA update indicated that the cancer risk associated with BaP is less than previous estimates. However, reportedly there are other studies which indicate that using BaP to evaluate carcinogenicity of other PAHs is insufficient.

I also support the request of the Duwamish River Clean Up Coalition that the EPA conduct testing and model cPAH water column concentrations with the revised sediment Remedial Action Levels and that you do so before finalizing the Explanation of Significant Decision.

This recommended change is being proposed to a clean-up plan that took many years to develop with many stakeholders participating. That this change might occur after only one roundtable meeting shortchanges the previous years of work necessary to get to this point. It is my hope that the EPA will continue to engage in further discussions with the stakeholders, informed by additional study, prior to making this change.

Thank you for your consideration of this request.

Best,



Lisa Herbold
District 1 Councilmember, Chair, Public Safety & Human Services Committee

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